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FILED

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SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CR 17 564 WHO

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ASHOT TADEVOSYAN et al.,

17 Defendant.

) CASE NO: CR

) UNITED STATES' MOTION TO SEAL
) INDICTMENT AND ARREST WARRANTS AND
) [PROPOSED] ORDER

SEAL

19 The United States hereby moves the Court for an order sealing this Motion, the concurrently
20 filed Indictment, the associated Arrest Warrants, the Sealing Order, and all other related documents in
21 the above-captioned case. The government believes that if the defendants are made aware of these
22 documents before they are arrested, that they may make efforts to avoid being arrested. The United
23 States further moves the Court for an order permitting that the Indictment be unsealed upon the initial
24 appearance of any named defendant in the Indictment. The government anticipates that the named
25 defendants will be arrested in the Central District of California, and the government is informed that a
26 magistrate judge in the Central District of California is not authorized to unseal an indictment on file in
27 the Northern District of California. Automatic unsealing upon initial appearance will streamline the
28 Rule 5 procedures in the Central District of California.

MOTION TO SEAL

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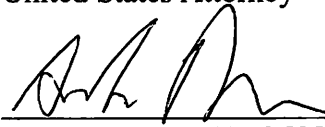
1 The United States also requests that, in the event not all defendants are taken into custody and
2 presented to the magistrate in the Central District of California on the same day, the portions of the
3 Indictment identifying those defendants will remain under seal. The government will prepare redacted
4 versions of the Indictment as necessary to facilitate the initial appearances while redacting information
5 identifying other defendants. The government believes unsealing the entire Indictment will risk alerting
6 an un-arrested defendant and causing him to flee, and it might undermine the ability of a willing
7 defendant to cooperate with the government.

8 The United States also requests that, notwithstanding any sealing order, the Clerk of Court be
9 required to give copies of the sealed documents to employees of the United States Attorney's Office and
10 Special Agents and other investigative law enforcement officers of the Federal Bureau of Investigation,
11 and that the United States Attorney's Office be permitted to serve working copies on federally deputized
12 state and local law enforcement officers, and other government and contract personnel acting under the
13 supervision of such investigative or law enforcement officers, to effectuate the Court's Order.

14
15 DATED: November 2, 2017

Respectfully Submitted,

16 BRIAN J. STRETCH
17 United States Attorney

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19 ANDREW F. DAWSON
20 Assistant United States Attorney

21 **[PROPOSED] ORDER**

22 Based upon the foregoing request, the Court hereby **ORDERS** that this Motion and Order, the
23 Indictment, and the warrants for the defendants' arrest shall be filed and kept under seal by the clerk of
24 the Court. The Court further **ORDERS** that the Indictment will be deemed unsealed upon the
25 defendants' initial appearance in magistrate court. However, in the event that not all defendants
26 identified in the Indictment make their initial appearances on the same day, the United States may redact
27 those portions of the Indictment that identify such defendants and provide the redacted Indictment to
28 defendants, their counsel, and other parties. Those redacted portions of the Indictment shall remain

1 under seal until further order of this Court. The Court hereby further **ORDERS** that any representative
2 of the United States Attorney's Office or the Federal Bureau of Investigation shall be allowed to obtain a
3 copy of the Indictment and arrest warrant for the defendants without further order of the Court. The
4 United States Attorney's Office shall be permitted to serve working copies on federally deputized state
5 and local law enforcement officers, and other government and contract personnel acting under the
6 supervision of such investigative or law enforcement officers, to effectuate the Court's Order.

7
8
9 DATED: November 2, 2017



HON. JOSEPH C. SPERO
UNITED STATES MAGISTRATE JUDGE